



**San Juan Generating Station**  
***State Alternative for BART***

***September 10, 2013***

- Unit 1 and Unit 4 Operating with SNCR Technology
- Unit 2 and Unit 3 Retired
- NO<sub>x</sub> Limit of 0.23 lb/Mbtu (w/ optimization testing to try to achieve lower limit)
- New SO<sub>2</sub> limit of 0.10 lb/Mbtu
- NSR Permit will be modified to incorporate NO<sub>x</sub> and SO<sub>2</sub> limits and require Unit shutdowns

# Estimated SJGS Emissions Reductions for State Alternative

Scenario	NO <sub>x</sub> (tpy)	SO <sub>2</sub> (tpy)	PM (tpy)	CO (tpy)	VOC (tpy)	CO <sub>2</sub> <sup>1</sup> (tpy)	Hg <sup>2</sup> (lb/yr)
Current	21000	10500	2380	33507	210	14,699,968	0.0842
New Alternative	8,011	3,483	1,184	18,615	104	7,314,801	84.0
% Reduction from Current	62%	67%	50%	44%	50%	50%	50%

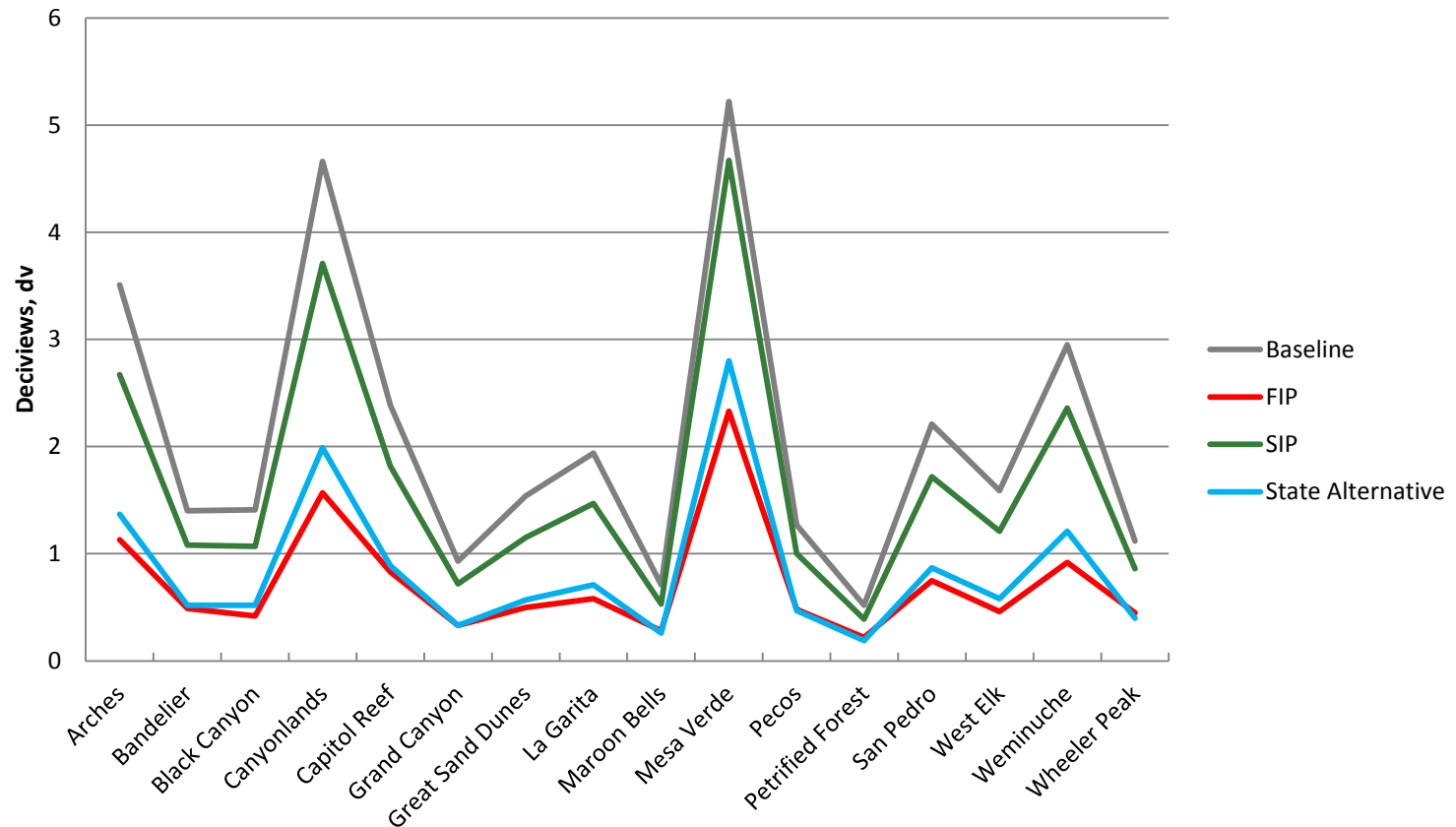
Note:

<sup>1</sup>CO<sub>2</sub> numbers from the 2011 EPA Clean Air Markets Division database based upon 2011 operating data.

<sup>2</sup>Hg numbers based on 1.2 lb/MBtu Mercury and Air Toxics Standard (MATS) Limit.

# Visibility Results Curves

## Visibility Impact Results



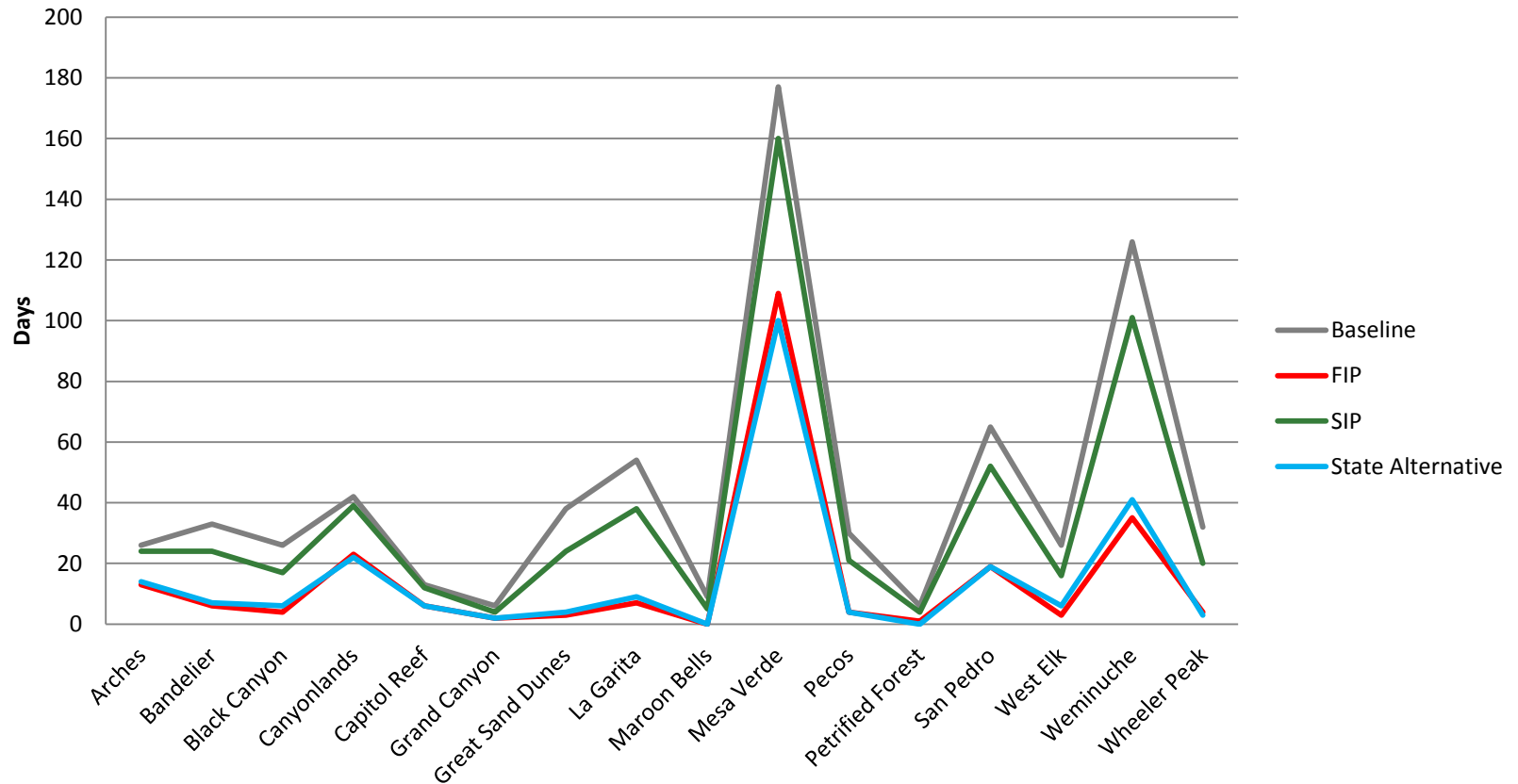
- State Alternative is similar to the FIP

## Average Days Over 0.5 dv

Class I Area	Baseline	FIP	SIP	State Alternative
Arches	26	13	24	14
Bandelier	33	6	24	7
Black Canyon	26	4	17	6
Canyonlands	42	23	39	22
Capitol Reef	13	6	12	6
Grand Canyon	6	2	4	2
Great Sand Dunes	38	3	24	4
La Garita	54	7	38	9
Maroon Bells	9	0	5	0
Mesa Verde	177	109	160	100
Pecos	30	4	21	4
Petrified Forest	6	1	4	0
San Pedro	65	19	52	19
West Elk	26	3	16	6
Weminuche	126	35	101	41
Wheeler Peak	32	4	20	3

# SJGS Average Days Results Curve (0.5 dv)

Average Days Compared to 0.5 dv



- Reduction in Criteria Pollutant Annual Emissions
- Reductions in CO<sub>2</sub> and Hg- each by 50%
- 53% (estimated) Reduction in Water Consumption
- 48% (estimated) Reduction in Coal Ash Generation
- Reduction in Truck Traffic (hauling coal ash back to the mine)
- Reduction in Visible Plumes (two stacks vs four)

# Future Generation – Combustion Turbine

- New Natural Gas-Fired Simple Cycle Combustion Turbine(s)
- Approximate size 150-200 MW
- Emissions of NO<sub>x</sub> Limited to 75 tons
- Best Available Control Technology will be Considered



# Compliance Timeline

Year	Month	Action
2013	September	NM Environmental Improvement Board Approves SIP
	December	EPA Determines Completeness of SIP
2014	April	EPA Proposes Action on the SIP
	October	EPA Final Action on the SIP
2016	January	Units 1 and 4 SNCR Installation (January 31, 2016)
	April	SNCR Performance Testing and Optimization Begins
	May	Begin Collection of NOx Emissions Data
2017	February	End of Long-Term SNCR Performance Test
	December	Units 2 and 3 Retirement (December 31, 2017)